

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:23-cv-20727-RKA

**RYAN BRESLOW, et al.,**

Plaintiffs,

v.

**MARK PHILLIPS, et al.,**

Defendants.

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**MOVEMENTDAO, et al.,**

Counterclaim-Plaintiffs,

v.

**RYAN BRESLOW, et al.,**

Counterclaim-Defendants.

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**[PROPOSED] ORDER GRANTING MOTION FOR CLARIFICATION OF  
TEMPORARY RESTRAINING ORDER**

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THIS CAUSE having come before the Court on the Defendant and Counterclaim-Plaintiff Mark Phillips and Defendant Benjamin Reed's (collectively, "Defendants") Expedited Motion for Clarification of Temporary Restraining Order. This Court having considered the motion, the memoranda submitted in support of and in opposition thereto, and all other relevant factors, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED.

The Order Granting the Plaintiffs' Emergency *Ex Parte* Application for Entry of Temporary Restraining Order, dated February 28, 2023 [ECF No. 18] (the "TRO") is clarified as follows:

- A. In order to comply with the TRO's requirement that transfers of MovementDAO funds originating from the DAO Endowment Gnosis within thirty days of entry of the TRO be unwound, Defendants may utilize the cryptocurrency exchange platform Coinbase in transferring funds back to the DAO Endowment Gnosis without violating the TRO. Specifically, Defendants may transfer funds to Coinbase before transferring those funds from Coinbase to the DAO Endowment Gnosis.
- B. Defendants' counsel, the Dhillon Law Group Inc. ("DLG"), is not required to return the \$300,000 deposit it received from Defendants on February 13, 2023, insofar as that amount now represents fees earned by DLG.

DONE AND ORDERED in Chambers at \_\_\_\_\_, Florida,  
this-\_\_ day of \_\_\_\_\_

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United States District Judge

Copies furnished to: All Counsel of Record